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Jim_Sieversen@fmc.c
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12/10/02 12:31 PM

To: Roger Turner <rturner@shoshonebannocktribes.com>
cc: Alonzo Coby <acoby@shoshonebannocktribes.com>, Linda Meyer/R10/USEPA/US@EPA
Subject: Re: Drums & AFM Closure

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In response to your questions:

1. DSU

1.1 Washwater/rinsate are being managed in drums, rather than going to a pond. We have collected a composite sample of the washwater/rinsate drums and expect lab results next week. I will notify you of the results. Washwater/rinsate will be sent offsite for disposal if the TCLP results show any exceedances of applicable limits, making the washwater/rinsate a characteristic hazardous waste. If the TCLP results are below the applicable limits, then the water in the drums will be managed on-site.

1.2 One drum contains the wooden insert removed from the black poly basin. The Closure Plan specifies that the drum containing the wooden insert will be shipped off-site as a hazardous waste.

1.3 There are one or two drums with general rubbish - PPE and plastic sheeting used for the temporary containment structure. Those drums have not yet been sampled.

2. AFM Washing Unit

2.1 The rinsate samples were shipped to the lab on Monday so we expect results next week. I will notify you of the results.

2.2 There is no Andersen filter media left onsite and I assume your comment really meant the washing equipment. The Closure Plan did not specify sampling of Andersen filter media or rinsate for radioactivity and, in the case of rinsate water, this would not be possible using the ORTEC analysis procedure because water would function as a radiation shield. The Closure Plan does require radioactivity testing at a minimum of 4 locations from the AFM washing equipment, specifically a leg, inside of the basin, a roller, and inside of the hood (Appendix B, Section 3.1 Sampling Locations). Those samples were collected and analyzed yesterday. I have attached the results, which were well below the decontamination verification level of 1000 dpm/100 cm². To be frank, the AFM washing equipment has sat idle for several years (i.e., many half-lives) so it was reasonable to expect little-to-no radioactivity, which is now documented by the ORTEC results.

(See attached file: ORTEC Results_12_09.doc)

Sent by James P. Sieverson
Environmental Manager

FMC Idaho LLC

Phone 208-236-8212

Fax 208-236-8255



ORTEC Results_12_09.doc

AFM Washing Unit Closure

Radionuclide Sampling Results for Removable Alpha Radioactivity

Analysis by ORTEC Alpha Spectrometer

EG&G ORTEC Soloist Analyzer operated at 500 mm Hg vacuum,
energy range of 3-8, 7.56 KeV, with Maestro computer software

All samples collected December 9, 2002 by J. R. Rice and J. P. Sieverson
per procedures specified in the AFM Washing Unit Closure Plan

Time of Sample (All samples collected and analyzed 12/09/02)	Sample Description	Results (dpm/100 cm ²)
1100	AFM Frame Leg	2
1105	AFM Basin (inside surface)	3
1109	AFM Roller	1
1115	AFM Hood (inside surface)	2
1117	Duplicate from AFM Hood	3
NA	Field Blank (exposed during collection of samples)	0
NA	Filter Blank (not exposed)	3
Decontamination Verification Level (Not to be exceeded)		1000

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Roger Turner
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Subject: Drums & AFM Closure

12/10/02 11:04 AM

Jim Sieverson:

Thank-you for notifying us, regarding the initiation of closure of the Drum Storage Unit, and the AFM Washing unit, and for scheduling our inspection of these units, on 12/5/02.

Drum Storage Unit:

With respect to the Disposal of liquid waste (4.6.1), and any solid/hazardous waste that is identified (4.6.2), could you please let me know the outcome of the analyses as soon as you receive it? Also, will the rinsate be sent off-site?

AFM washing Unit:

In a similar manner as above, for the lab tests carried out at this unit, the TCLP metals, on the rinsate, could you please let me know what the results are from the lab when you get it? (Also, is there any radiation testing of the Anderson filter, or the rinsate from cleaning this unit?)

Thanks again for coordinating with us.

Roger Turner